BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2022-52-E

Dominion Energy South Carolina,
Incorporated's 2022 Annual Update on
Demand Side Management Programs and
Petition to Updated Rider

Dominion Energy South Carolina,

Dominion Energy South Carolina,

DINITED STATES DEPARTMENT

OF DEFENSE AND ALL OTHER

FEDERAL EXECUTIVE

AGENCIES' PETITION TO

INTERVENE

Pursuant to the Public Service Commission's Regulation 103-825, the United States Department of Defense and all other Federal Executive Agencies ("DoD/FEA"), by and through its legal counsel, hereby requests that it be granted leave to intervene in the above captioned matter, and in support thereof states:

- 1. DoD/FEA has a substantial interest in this proceeding because it owns and operates numerous facilities and buildings within Dominion Energy South Carolina Inc.'s ("DESC's") territory and annually purchases a substantial amount of electric services from DESC. As such, this proceeding will impact DoD/FEA's future electric costs. No other party can adequately represent the Federal Government's interest. DoD/FEA has not made a determination of its position in this case, but DoD/FEA's intervention would not unduly delay the proceedings or prejudice the rights of other parties.
- 2. The Federal Property and Administrative Services Act, 40 U.S.C. § 501(c) authorizes the United States General Services Administration ("GSA") to represent consumer interests of the Federal Executive Agencies in proceedings before state regulatory bodies. Pursuant to 40 U.S.C. §121(d), GSA may delegate to DoD the authority to represent all Federal Executive Agencies in a proceeding involving a public utility before

a regulatory body when DoD and GSA agree that representation by DoD is in the best interests of the Federal Government.

3. The attorney authorized to represent DoD/FEA in this proceeding and take service of all documents is:

> Emily W. Medlyn General Attorney U.S. Army Legal Services Agency Regulatory Law Office (JALS-ELD) 9275 Gunston Road Fort Belvoir, Virginia 22060-4446 Telephone: (703) 614-3918

Email: emily.w.medlyn.civ@army.mil

WHEREFORE, the United States Department of Defense and all other Federal Executive Agencies requests that it be granted leave to intervene as a full party in this proceeding, with all rights attendant to full party status.

Respectfully submitted,

Emily W. Medlyn SC Bar #70501 General Attorney

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